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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

JANE DOE, individually and on behalf of all others similarly situated, *Plaintiffs*, v. **YOUTUBE, INC.** *Defendant*.	Case No. 4:20-CV-7493-YGR **JOINT STIPULATED REQUEST AND [PROPOSED] ORDER TO EXTEND TIME TO FILE AMENDED COMPLAINT**

1   This Stipulation is entered between Plaintiff Jane Doe ("Plaintiff"); and YouTube, LLC

2   ("Defendant"), by and through their respective counsel.

3   WHEREAS, Plaintiff Jane Doe, on behalf of herself and all others similarly situated, filed the

4   above captioned action on September 21, 2020, in the Superior Court of California, County of San

5   Mateo;

6   WHEREAS, Defendant YouTube, Inc., removed the above captioned action to this Court on

7   October 24, 2020;

8   WHEREAS, Plaintiff agreed to extend the deadline for Defendant to respond to Plaintiff's

9   Complaint until December 2, 2020 (ECF No. 6);

10 WHEREAS, Defendant filed a motion to dismiss on December 2, 2020 (ECF No. 16);

11 WHEREAS, the parties stipulated to a revised briefing schedule on December 11, 2020 (ECF

12 No. 22), which was entered by the Court on December 15, 2020 (ECF No. 23);

13 WHEREAS, on July 13, 2021, this Court heard oral argument on Defendant's motion to

14 dismiss;

15 WHEREAS, on July 14, 2021, the Court granted Defendant's motion to dismiss with leave to

16 amend and ordered Plaintiff to file her amended complaint by no later than August 13, 2021 (ECF No.

17 32);

18 WHEREAS, since entry of the Court's July 14, 2021 order, the parties have conferred through

19 their counsel of record and agree that they would like an opportunity to discuss potential resolution

20 informally;

21 IT IS HEREBY STIPULATED AND AGREED, by and between Plaintiff and Defendant, as

22 represented by their undersigned counsel, subject to the approval of the Court, the last date by which

23 Plaintiff shall file an Amended Complaint be extended to October 15, 2021.

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1   Respectfully submitted,

2   Dated: August 11, 2021

3   By: /s/ *Zachary M. Briers*   By: /s/ *Steven N. Williams*
4   Zachary M. Briers (SBN 287984)   Steven N. Williams (SBN 175489)
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                                          Counsel for Plaintiff and the Proposed Class
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12   **PURSUANT TO STIPULATION, IT IS SO ORDERED**

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14   Dated: August 13, 2021
                                          HONORABLE YVONNE GONZALEZ ROGERS
15   UNITED STATES DISTRICT JUDGE

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